

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division**

In re:

Sepopo S. Senouwoe

Debtor

Case No.: 24-50148-RBC
Chapter 13

MOTION TO EXTEND TIME TO FILE MODIFIED CHAPTER 13 PLAN

COMES NOW the Debtor, Sepopo S. Senouwoe, by counsel, and he hereby moves this Honorable Court for an extension of time within which to file his modified Chapter 13 Plan, presently due in this matter on or before May 29, 2024. In support thereof, the Debtor states as follows:

1. This case was commenced, by the Debtor, by filing a voluntary petition under Chapter 13 of the Bankruptcy Code on March 20, 2024.
2. On May 13, 2024, this Court continued the confirmation hearing to June 27, 2024 at 9:30 a.m. In that same order, the Court denied confirmation of the Debtor's Chapter 13 Plan and required that the Debtor file a modified Chapter 13 Plan on or before May 29, 2024.
3. Counsel for the Debtor has not obtained all necessary information to properly amend the Debtor's Chapter 13 Plan; namely, bank statements for March 2024, which could affect the asset liquidation analysis.
4. To allow additional time for counsel to contact the Debtor, counsel requests additional time to file the Debtor's modified Chapter 13 Plan.

WHEREFORE, and for the foregoing reasons, the Debtor respectfully prays that this Honorable Court grant an extension of the date on which to file his Chapter 13 Plan to June 7, 2024.

SEPOPO S. SENOUWOE
By Counsel

/s/ John P. Goetz
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Counsel for the Debtors

Certificate of Service

I hereby certify that I have served the 29th day of May, 2024, by electronic mail, a true copy of the foregoing Motion to Extend Time to the Chapter 13 Trustee.

/s/ John P. Goetz
John P. Goetz